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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION**

HOLBROOK HOLDINGS, INC.,

Plaintiff,

v.

MARC COHODES,

Defendant.

Civil Action No. CV-24-175-BU-JTJ

**STIPULATED MOTION FOR  
EXTENSION OF TIME TO FILE  
ANSWER TO COMPLAINT**

Plaintiff Holbrook Holdings, Inc. filed its Complaint against Defendant Marc Cohodes on November 8, 2024. A request for waiver of service was sent by Counsel for Plaintiff to Counsel for Defendant on November 20, 2024, and Counsel for Defendant subsequently executed a waiver of service of the Complaint, which was filed on November 21, 2024. Defendant's answer to the Complaint was due January 21, 2025. Defendant first requested additional time to respond, up to and including February 10, 2025. Plaintiff stipulated and consented to the extension.

Plaintiff has now been advised that new counsel will be appearing on behalf of Defendant in this matter and as a consequence, a further extension of time in which to appear in this matter has been requested by Defendant's counsel. Defendant requests up to and including February 21, 2025 in which to answer the Complaint or appear in this matter. Plaintiff stipulates and consents to this extension.

Further, the parties stipulate and agree that good cause exists for this extension because Counsel for Defendant is new to this matter having only recently taken over the defense from previous counsel for Defendant and due to previous commitments including the start of a 5-day jury trial on February 10, 2025 in Yellowstone County entitled *Estate of Collin v. Heather Hauser*, Cause No. DV 20-1160, additional time is needed.

Accordingly, the parties respectfully jointly move the Court for an extension.

Dated: January 30, 2025.

/s/ Matt J. Kelly

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*Counsel for Plaintiff Holbrook Holdings,  
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Dated: January 30, 2025.

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*Counsel for Defendant Marc Cohodes*